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November 7, 1989

F. H. Weiler, Manager, Environmental Restoration  
Office of Assistant Manager for Nuclear Programs  
Environmental Support Office  
Idaho Operations Office, USDOE  
785 DOE Place,  
Idaho Falls, Idaho 83402

Dear Mr. Weiler:

Subject: EPA Region X review of Summary Assessments CPP-41, CPP-43,  
CPP-70, CPP-71, CPP-76, and CPP-77.

After reviewing EPA's comments on Summary Assessments CPP-41, CPP-43,  
CPP-70, CPP-71, CPP-76, and CPP-77, WINCO has the following comments.

#### General

The comments pertaining to CPP-41 and CPP-43 both stated that the information provided was insufficient for administrative closure. It was also stated that information requested on CPP-43 in EPA's January 5, 1988 letter was not provided in this revision. The comments also stated that the drawings referenced in the Summary Assessments for CPP-70, -71, -76, and -77 were not submitted with the assessments.

Very little information exists on CPP-41 and CPP-43 since they were in existence in the "early" years of the ICPP (approximately late 1950's to mid 1960's). The information about these units was gathered by interviewing individuals, and many of the interviewees recollections about units were imprecise. Therefore, little information was available when the Summary Assessments were written. This was denoted in the "Methods of Assessment" sections (see note 2 in Revised Summary Assessment of CPP-41, and note 4 in Revised Summary Assessment of CPP-43).

EPA's January 5, 1988 letter requested information on 1) where the unit was located under CPP-651, 2) years of operation, 3) the likely solvents used during operation, and 4) the size of the operation/quantities of waste disposed at CPP-43. Since little is known about the unit, the



information requested was unavailable when the Summary Assessment was written. This was stated in note 4 of the "Methods of Assessment" section. The individual interviewed (only one individual could recall the grease pit) stated that the pit was located near the northwest corner of the building, but he was unsure exactly where. He also stated that he was unsure of how long the unit was used, or what the dimensions of the unit were. He also stated that to his knowledge the unit was only used for the disposal of motor oil and grease.

Concerning the drawings referenced in the Summary Assessments, all drawings referenced in CPP-70, -71, -76, and -77 are present in the document submitted.

In response to EPA and the State of Idaho's comments, WINCO has re-interviewed some of the individuals associated with the initial assessments and reviewed additional historical photographs and maps of the ICPP to determine if additional information could be found on CPP-41 and CPP-43. This information is presented below.

#### SWMU CPP-41

CPP-41 consists of two pits, one is reported to be beneath the FAST Facility (CPP-666) and the other beneath the Maintenance Building (CPP-663). The exact location of the pits is unknown. WINCO discussed EPA's comments with one of the individuals who interviewed plant personnel for the initial assessment. He stated that the descriptions were in the vein of "... the old fire training pits were out around where CPP-666 and CPP-663 are now located ...," but when asked for more specifics they were unable to provide any more details. WINCO also reviewed historical photographs of the ICPP and was unable to confirm the locations of the pits.

Although the exact location of the pit near building CPP-666 is not known, the area excavated for the construction was so large the likelihood of any hazardous constituents remaining in the location after construction is nil. CPP-666 is approximately 305 x 126 feet. During construction of the site an area of approximately 500 x 250 was excavated, most to the 40 foot basalt layer. The base slab for the building was poured directly on the basalt. The facility was then constructed on the base slab and the excavation was backfilled around the building foundation.

CPP-663 is approximately 210 x 161 feet. Prior to construction, the area was lower than the surrounding surface grade. Excavated materials from previous construction projects were piled in the area as fill. During construction, the excavated materials were leveled and additional fill materials were brought in to level the surrounding surface grade. During interviews with personnel associated with construction they stated that they did not remember a pit being in the area prior to construction.

Since the exact locations of the pits are not known and extensive site preparation was conducted at each location it is unlikely that either pit exists as a unit in its original location and it would be impossible to determine where to conduct sampling for characterization. Therefore, WINCO still recommends that CPP-41 be removed from the "universe of SWMU's" by administrative closure.

#### SWMU CPP-43

CPP-43 consisted of a grease pit located South of the CPP-637/620 complex. The exact location of the pit could not be determined from interviews conducted during the initial assessment. Only one individual could remember the pit, but he could not remember a specific location or waste type/location. Other employees who worked in the area during the early 1960's were interviewed, but none could substantiate that a grease pit existed in the area.

WINCO has since re-interviewed the individual and reviewed additional historical photographs of the ICCP. The individual was able to locate what he believes to be the pit on an old photograph (photograph # 62-7669). WINCO was unable to confirm that the location on the photograph was actually a grease pit. However, if the location indicated by the individual is correct, the pit was located approximately on the northeast corner of the Irradiated Fuel Storage Facility (CPP-651). However, it could not determine from the photograph if the pit was actually under the building or adjacent to the building.

The individual was asked to give his "best guess" on the dates of operation, waste types, and construction of the unit. He stated that he did not remember the dates of operation. However, the photographs (photograph #s 62-7669 and 66-2370) indicate that the pit was in existence in 1962 and was filled in by 1966. He stated that all he could remember being disposed to the pit was automotive oil and possibly small quantities of acid (he stated that he did not remember any other "organics" going into the pit). The individual was still unsure of the dimension of pit but stated that he thought that it may have been 18 inches wide by 5-8 feet long by 4-5 feet deep. To his best recollection, he thought that the walls were concrete and the bottom consisted of red fire brick.

Since the information is still inconclusive, WINCO will sample the general location around the northeast corner of CPP-651, if directed to do so.

#### SWMUs CPP-70, CPP-71, CPP-76, and CPP-77

EPA's letter stated that the drawings referenced in the text were not included in the Summary Assessment. The referenced drawings are present as stated. Some confusion may have arisen from the fact that drawings are from different years and produced by several different contractors.

Depending on the time frame and contractor, various numbering systems were used. However, the file numbers cited are included on each drawing. The file numbers that are presently being used are the last six digits in the "Index Code Number" box. These numbers may be stated as "serial" or "drawing" numbers, but in all cases the last six digits are used.

If have any questions, or need any assistance please contact me at 526-0115, or G. Sehlke at 526-3008.

Sincerely,



A. J. Matule, Manager  
Environmental Engineering

GS